

### **REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for the carefully considering this application and for the courtesies extended during the Examiner Interview.

#### **Examiner Interview**

The Applicant's representative and the Examiner participated in an interview on March 13, 2006. During the interview, the Applicant's representative briefly described the invention to the Examiner and discussed the U.S. Patent Number 6,128,740 ("Curry"). In particular, Applicant's representative discussed proposed claim amendments with the Examiner and how Curry does not teach the present invention as recited in the proposed amended claims. In response, the Examiner suggested claim amendments to further clarify the invention, which have been incorporated into this response.

#### **Disposition of the Claims**

Claims 1-5, 7-12, and 14-16 are pending in this application. Claims 1 and 9 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 9.

#### **Claim Amendments**

Independent claims 1 and 9 have been amended to clarify the present invention. Specifically, independent claims 1 and 9 have been amended consistent with suggestions by the Examiner during the Examiner Interview. More specifically, independent claim 1 and 9 have been amended to clarify that a plurality of delta CRLs are created from at least three generations of CRLs comprising the latest owned CRL and a current CRL by a sender. Further, independent claims 1 and 9 are further amended to clarify that each of the plurality of delta CRLs that are created span two consecutive generations of CRLs in the at least three generations of CRLs. Support for these

amendments may be found in Figures 4 and 5 and associated text in the Specification. No new subject matter has been added by way of these amendments

### **Rejections under 35 U.S.C. § 103(a)**

Claims 1-5, 7-12, and 14-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,687, 235 (“Perlman”) in view of U.S. Patent No. 6,128,740 (“Curry”). To the extent that this rejection applies to the amended claims, this rejection is respectfully traversed.

The claimed invention relates to creating a merged delta certificate revocation list (CRL) that represents changes between at least three generations of digital certificate revocation lists. Specifically, with each new generation of CRL that is created, a delta CRL is also created by a sender which represents the changes between the two consecutive generations of CRLs (*i.e.*, previous generation and the new generation). Accordingly, as multiple generations of CRLs are created, multiple delta CRLs are also created. When a CRL recipient requests the current CRL and multiple generations of CRLs have passed between the latest owned CRL of the CRL recipient and the current CRL (which the CRL recipient requests), the multiple delta CRLs which have been created are merged to create a single merged delta CRL. The single merged delta CRL is sent from the sender to the CRL recipient. Accordingly, the amended claims require, in part, that multiple delta CRLs are created from multiple generations of CRLs, wherein each of the multiple delta CRLs comprise two consecutive generations of CRLs, merged to create a single merged delta CRL, and the single merged delta CRL is sent to the CRL recipient after performing the merging operation.

Turning to the rejection, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a

reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. (*See MPEP* section 706.02(j)).

Applicant respectfully asserts that Curry fails to teach creating a plurality of delta CRLs from multiple generations of CRLs and merging the plurality of delta CRLs to create a single merged delta CRL, as asserted by the examiner. Specifically, in rejecting claims 1 and 9, the Examiner incorrectly equates a segmented CRL taught by Curry with the delta CRLs of the claimed invention. In fact, Curry teaches that a segmented CRL corresponds to a CRL divided into "memory segments for one or more groups of certificates, wherein each segment facilitates the storage of data." (*See Curry*, col. 5, ll. 1-8). Further, Curry teaches that segments of the segmented CRL are at various distribution points. Thus, the segments of the segmented CRL are from a single generation of CRL.

Moreover, to further define the segmented CRL, Curry references U.S. Patent No. 5,699,431 ("Van Oorschot"). (*See Curry*, col. 5, ll. 5-9). Van Oorschot not only clearly defines the segmented CRL as being a single CRL divided across memory locations, but also contrasts the segmented CRLs with a definition of a delta CRL. (*See, e.g., Van Oorschot*, col. 3, ll. 29-48 and col. 4, ll. 35-44). Therefore, in contrast to the claimed invention that requires multiple delta CRLs created from *multiple* generations of CRLs, a segmented CRL taught by both Curry and Van Oorschot (as referred to in Curry) corresponds to a *single* generation of CRL divided into different segments.

Accordingly, Curry fails to teach creating multiple delta CRLs from at least three generations of CRLs comprising the latest owned CRL and a current CRL at a sender, wherein each of the delta CRLs span two consecutive generations of CRLs. Further, Perlman does not teach that which Curry lacks. Specifically, Perlman teaches creating a

single delta CRL which is simply produced by querying the database for the certificates revoked since a timestamp provided by the CRL recipient. If the delta CRL is too large, then the delta CRL is *divided* into multiple delta CRLs. Accordingly, in Perlman, each of the multiple delta CRLs *do not* span two consecutive generations of CRLs as required by the claimed invention.

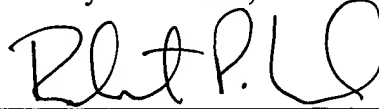
In view of the above, it is clear that Curry and Perlman, whether considered together or separately, fail to support the rejection of claims 1 and 9. Accordingly, claims 2-5, 7, 8, and 10-16, which depend directly or indirectly from claims 1 and 9, are allowable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

### Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/534001; P6053).

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Respectfully submitted,

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